

Dear planning commission. This submittal addresses letters received last week. Our proposed project meets the code criteria. Please approve the project with conditions. We have consistently proven we can meet the code criteria.

**Thanks
Matt Gillis**

Affordable Housing-

From: Milwaukie's Housing Strategies' report adopted July 2018:

"Building market rate housing is an important part of the overall housing affordability strategy. New market rate units will not immediately increase the stock of existing units, but they will help to keep existing affordable units affordable. When housing demand is high and the supply for rent to homeownership does not keep pace prices increase. Decreased affordability is the result."

From APG and Johnson Economics for Clatsop County in 2019:

"Newly-built housing supply will tend to be more expensive housing, as it is up-to-date and in better condition than older housing. However, adding new supply for higher-income households is necessary to allow the older housing supply to "filter" to those with more modest income."

These statements show how our proposed development would help alleviate housing needs.

Floodplain

The reality of the 96' flood is that the estimated flow was above the flow of the 500-year flood event. The house next door with a foundation approximately 4-5 feet lower than our proposed homes built; to much lower building standards is still standing today after the 96 flood. Although 12205 is shown on the flood maps to have been inundated with water in 96, There are still 1970's cabinets and tile in the lower level that do not show flood damage.

There have been historical floods prior to 1996, but there have been many dams and flood control measures implemented on over the last 100 years to protect against flooding. They have been implemented on streams and tributaries that feed into the Willamette River, which have reduced the chance of flooding. FEMA has done the research to reduce flooding risk. Our proposed development complies with FEMA code criteria.

Addressing Letters

Since the planning hearing, there was a person who recently purchased a house in the neighborhood that was very vocal in a negative light against Elk Rock Estates within the community. They posted signs all over town. Staff stated they posted signs in the Ardenwald, they were at the farmers market and were all over town promoting Stop Elk Rock Estates. Their propaganda stated Save our Slough, Stop Elk Rock Estates. It also stated: "stop elk rock estates- Be aware of what is being proposed in your floodplain, in your park." **Their statements are wrong, we are not touching the slough or the park.** Even though there were new comments, very few wrote in until they were pushed with misleading propaganda, even though there was a public notice sign posted onsite for over 60 days prior to the hearing. These letters do not affect the code criteria.

Road and floor Elevation

Vera Kolias

RE: Question

To: matt gillis, Robinson, Michael C., Cc: Dennis Egner, Justin Gericke, Steve Adams

10:01 AM

[Details](#)



Hi Matt,

The City Engineer is most comfortable with enforcing 39.0 ft NAVD for building floor elevations and 37.4 ft NAVD for street elevations.

I will try to find a date and time next week to meet to discuss the conditions of approval as you requested.

-Vera

VERA KOLIAS, AICP
Associate Planner
503.786.7653
City of Milwaukie
6101 SE Johnson Creek Blvd * Milwaukie, OR 97206

Email from Staff-

We agree that the road elevation should be 37.4 ft NAVD. Although we do not agree that building floor elevations should be 39 ft NACD per MCC. But we have raised our floor elevations to meet this request. Our road and floors elevations conform with the email above.

MSC-221

August 13, 2019

Matt Gillis
11650 SW 67th Avenue
Suite 210
Tigard, OR 97223



RE: ELK ROCK ESTATES COMMENTS

I compiled the attached information because it appears the City is proposing a higher standard on the Elk Rock Estates project than they did for Milwaukie Riverfront Park. Both projects are in the Willamette Greenway and Floodplain. The only reason I make this comparison is because the projects are very close together and would appear to have similar impacts, therefore I wanted to present this comparison.

1. The Milwaukie Riverfront Park plans were reviewed and approved by the National Marine Fisheries Service (NMFS) even though the storm water facility includes dead storage below the 100-year storm event. Dead storage means that the pond outlet structure is higher than the elevation at the bottom of the facility. The rim elevation of the outlets is set 6" above the base elevation of the facility. Once the water drops below the rim elevation there is no way for fish to escape. The Elk Rock Estates storm water facility does not propose dead storage and it is sloped at 1% toward the outlet structure. In the unlikely event that fish got stuck in this facility they would end up at the outlet structure which discharges to the slough. I've included a copy of NMFS approval, a copy of the Riverfront Park storm water plan and a page from the FEMA Kellogg Street Bridge grant that concludes that no listed species or other designated critical habitat are present in the area and that the project is not located in or near essential fish habitat. The proposed Elk Rock Estates project is very close to the park and should fall under the same standard. It appears that during the Milwaukie Riverfront Park and Bridge project that the City supported statements in grant and permits that suggest the Willamette River is not fish habitat as noted in the FEMA grant information. However for private development it is apparently fish habitat and the storm facility has to meet "fish passage". I've also included the standard outlet detail from the Park plans and indicated we intend to use the same detail, except we will set the rim elevation at the base of the proposed facility so that it does not create dead storage and trap fish.
2. The most recent conditions of approval suggest that the storm water facility would be unattractive and not blend in the local environment. Those statements are incorrect and misleading. The preliminary landscape plan submitted indicate a high degree of landscaping prepared by an award winning landscape architect. HHPR has a history of designing high caliber landscaping projects including many parks and water related projects. HHPR has designed hundreds of storm water facilities throughout the metro area and we are well versed in the survivability and aesthetics of these facilities. We take this very seriously and find it odd that the City would make those statement about the facility without providing anything to suggest it doesn't meet the City of Portland Storm Water Manual or evidence that it won't blend in to the area. The goal for this facility is three pronged, 1) It provides a natural storm water treatment method while providing habitat enhancement, 2) provide additional flood plain storage nearer

to the river and 3) be aesthetically pleasing to the residents and guests. If the City would like to see additional features such woody debris or landscape boulders they can be added, but it has so far been misrepresented in the comments and draft conditions of approval. I have included some photos of fully matured vegetated swales designed by the same landscape architect to show that these facilities are very attractive when mature.

3. Another thing I noticed when reviewing the Milwaukie Riverfront Park plans is that they do not clearly indicate where HCA line is nor indicate if any mitigation was performed, however they do indicate planting/seeding well within the floodplain and below the ordinary high water line. The Quoting the US Army Corp permit it states "the City states that extensive shoreline treatment and planting is considered to be **self-mitigating** and will provide significant benefitand that no additional mitigation is being proposed for the project". The Elk Rock Estates project provides a higher degree of mitigation and will definitely enhance the area. Replacing invasive species with native plants and trees will provide a vast improvement that would not occur without this project, yet there appears to be push back that isn't supported by recent projects or code.
4. We have demonstrated that the project meets the balanced cut/fill for the 100-year flood as well as 1996 inundation. The access way has been designed to one foot above the 100-year event and the building finish floors have been set one foot above the 1996 flood elevation of 38' per the City statement. I can't find a code requirement for the higher finish floor elevations, but we have demonstrated the project can meet the request. We would prefer to meet the FEMA requirement of one foot above the BFE if at all possible to reduce the amount of earthwork required within the flood plain.

Sincerely,

A handwritten signature in blue ink that reads "Ken Valentine". The signature is written in a cursive, flowing style.

Ken Valentine, PE



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest Region
7600 Sand Point Way N.E., Bldg. 1
Seattle, WA 98115

Refer to NMFS No:
NWR-2010-563

May 10, 2013

Shawn H. Zinszer
Chief, Regulatory Branch
U.S. Army Corps of Engineers
P.O. Box 2946
Portland, Oregon 97208-2946

Re: Endangered Species Act Biological Opinion and Magnuson-Stevens Fishery
Conservation and Management Act Essential Fish Habitat Response for Milwaukie
Riverfront Park, Willamette River (HUCs 170900120104 and 170900120103),
Multnomah County, Oregon (Corps No.: NWP-2009-00019)

Dear Mr. Zinszer:

The enclosed document contains a biological opinion (opinion) prepared by the National Marine Fisheries Service (NMFS) pursuant to section 7(a)(2) of the Endangered Species Act (ESA) on the effects of the proposal by the U.S. Army Corps of Engineers (Corps) to authorize the City of Milwaukie's proposal for the Milwaukie Riverfront Park using the Corps' regulatory authority under section 404 of the Clean Water Act and section 10 of the Rivers and Harbors Act.

In this opinion, NMFS concludes that the proposed action is not likely to jeopardize the continued existence of Lower Columbia River (LCR) Chinook salmon (*Oncorhynchus tshawytscha*), Upper Willamette River (UWR) spring-run Chinook salmon, LCR coho salmon (*O. kisutch*), LCR steelhead (*O. mykiss*), UWR steelhead, or result in the destruction or adverse modification of critical habitat designated or proposed for these species.

As required by section 7 of the ESA, NMFS is providing an incidental take statement with the opinion. The incidental take statement describes reasonable and prudent measures NMFS considers necessary or appropriate to minimize the impact of incidental take associated with this action. The take statement sets forth nondiscretionary terms and conditions, including reporting requirements, that the Federal action agency must comply with to carry out the reasonable and prudent measures. Incidental take from actions that meet these terms and conditions will be exempt from the ESA's prohibition against the take of listed species.

This document also includes the results of our analysis of the action's likely effects on essential fish habitat (EFH) pursuant to section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), and includes two conservation recommendations to avoid, minimize, or otherwise offset potential adverse effects on EFH. One of these conservation recommendations is identical to the ESA take statement's terms and conditions. Section 305(b) (4) (B) of the MSA requires Federal agencies to provide a detailed written response to NMFS within 30 days after receiving these recommendations.

NWP-2009-19

NATIONAL MARINE FISHERIES APPROVED THE MILWAUKIE RIVERFRONT PARK UTILIZING SAME TYPE OF STORMWATER FACILITY AS PROPOSED FOR ELK ROCK ISLAND. THE RIVERFRONT PARK FACILITY INCLUDED DEAD STORAGE THAT WOULD TRAP FISH DURING 100-YEAR FLOOD. ELK ROCK ESTATES DOES NOT PROPOSE DEAD STORAGE



If the response is inconsistent with the EFH conservation recommendations, the Federal action agency must explain why the recommendations will not be followed, including the scientific justification for any disagreements over the effects of the action and the recommendations. In response to increased oversight of overall EFH program effectiveness by the Office of Management and Budget, NMFS established a quarterly reporting requirement to determine how many conservation recommendations are provided as part of each EFH consultation and how many are adopted by the action agency. Therefore, we request that in your statutory reply to the EFH portion of this consultation, you clearly identify the number of conservation recommendations accepted.

Please direct questions regarding this opinion to Mischa Connine, in the Oregon State Habitat Office, at 503.230.5401.

Sincerely,



William W. Stelle, Jr.
Regional Administrator

cc: JoAnn Herrigel, City of Milwaukie

RECORD OF ENVIRONMENTAL CONSIDERATION (REC)

Project ID: PA-10-OR-4258-PW-00068

Title: ST0265 - Kellogg Creek Bridge

Environmental Law/ Executive Order	Status	Description	Comments
Endangered Species Act (ESA)	Not Applicable	No listed species and/or designated critical habitat present in areas affected directly or indirectly by the federal action - Review concluded	
Farmland Protection Policy Act (FPPA)	Not Applicable	Project does not affect designated prime or unique farmland - Review concluded	
Fish and Wildlife Coordination Act (FWCA)	Not Applicable	Project does not affect, control, or modify a waterway/body of water - Review concluded	
Migratory Bird Treaty Act (MBTA)	Not Applicable	Project not located within a flyway zone - Review concluded	
Magnuson-Stevens Fishery Conservation and Management Act (MSA)	Not Applicable	Project not located in or near Essential Fish Habitat - Review concluded	
National Historic Preservation Act (NHPA)	Not Applicable	Not type of activity with potential to affect historic properties - Review concluded	
Wild and Scenic Rivers Act (WSR)	Not Applicable	Project is not along and does not affect Wild and Scenic River - Review concluded	

CONDITIONS

Special Conditions required on implementation of Projects:

NEPA: No EHP review was performed on Version Zero (0) because this is a \$0 project. Any subsequent versions of this project require an EHP review.

Source of condition: NEPA Determination

Monitoring Required: No

Standard Conditions:

Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.

This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize federal funding.

If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.

SHEET CONTROL POINT TABLE			
POINT NO.	NORTHING	EASTING	ELEVATION
26	654163.65	7652914.28	38.40
102	654381.14	7652885.70	33.90
51	654383.32	7653071.26	36.23
32	654496.80	7653056.31	34.35
25	654364.23	7653020.83	35.90
9	654485.60	7653029.87	34.56

SURVEY VERTICAL CONTROL IS BASED ON NAVD 1988 DATUM.

DEAD STORAGE BELOW 100-YEAR FLOOD WITH NO FISH PASSAGE

DEAD STORAGE BELOW 100-YEAR FLOOD WITH NO FISH PASSAGE

GRADING ABBREVIATIONS

- 1/2 1/2 CURVE LENGTH/ANGLE
- 1/4 1/4 CURVE LENGTH/ANGLE
- FFE FINISH FLOOR ELEVATION
- FG FINISH GRADE
- GB GRADE BREAK
- HP HIGH POINT
- LP LOW POINT
- MID MIDPOINT
- PC POINT OF CURVATURE
- PCC POINT OF COMPOUND CURVATURE
- PRC POINT OF REVERSE CURVATURE
- PT POINT OF TANGENCY
- TC TOP OF CURB

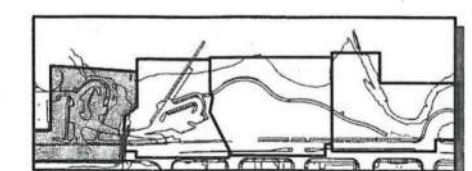
NOTE: SPOT ELEVATIONS SHOWN HEREON ARE TO FINISHED PAVEMENT SURFACE UNLESS INDICATED OTHERWISE

DRAINAGE SYSTEM KEYNOTES

- ① AREA DRAIN, SEE DETAIL 5, SHEET C504
- ② DITCH INLET, SEE DETAIL 4, SHEET C504
- ⑥ OUTFALL RIPRAP, SEE DETAIL 4, SHEET C505
- ⑦ STORM DRAINAGE PIPE PER TRENCH BEDDING AND BACKFILL DETAIL 1, SHEET C506
- ⑩ MANHOLE PER DETAIL 6, SHEET C505

STRUCTURE SCHEDULE

STRUCTURE	RIM ELEV	I.E. IN ELEV	I.E. OUT ELEV	NORTHING	EASTING
DI#1	31.50		29.33(E)	654341.59	7652924.95
DI#2	31.50	28.19(W)	28.00(N)	654356.98	7652983.14
AD#1	32.50	28.61(W)	29.83(E)	654422.13	7652867.41
AD#2	32.50		28.50(E)	654423.00	7652928.59
AD#3	32.50		28.50(W)	654417.02	7652984.83
AD#4	36.75		35.00(S)	654261.10	7653094.69
MH#1	33.53	26.42(S) 26.50(W) 26.50(E)	26.30(N)	654423.00	7652928.59
OUTFALL#1			25.82(S)	654453.64	7652952.04



KEY MAP
NOT TO SCALE

2100 SW River Parkway
Portland OR 97201
Phone: 503.223.6863
Fax: 503.223.2701

CITY OF MILWAUKIE	
DEPARTMENT	APPROVAL DATE
CITY LANDSCAPE ARCHITECT	SIGNATURE
COMMUNITY DEVELOPMENT	
PUBLIC WORKS	

PROJECT
MILWAUKIE RIVERFRONT PARK PHASE 2 - BOAT RAMP AND PATHWAY
S.E. HARRISON STREET - KELLOGG CREEK

SHEET TITLE
GRADING AND DRAINAGE PLAN

NO.	DATE	REVISION

SCALE: AS SHOWN
DATE: 4-1-2014
DRN. RFH
CK. SDH

C400
JOB NO. MAEX0000-0021

1 GRADING AND DRAINAGE PLAN
1" = 20'

SAME OUTLET STRUCTURE PROPOSED FOR ELK ROCK ISLAND DEVELOPMENT

OMIT REMOVE

REGRADE TO CURB

DUCTILE IRON

MATCHLINE SEE SHT. C401

Surface Properties - earthwork **EARTHWORK DATA:**

Information | Definition | Analysis | Statistics | EARTHWORK CALCULATED FOR CUT/FILL BELOW THE 38 FOOT CONTOUR

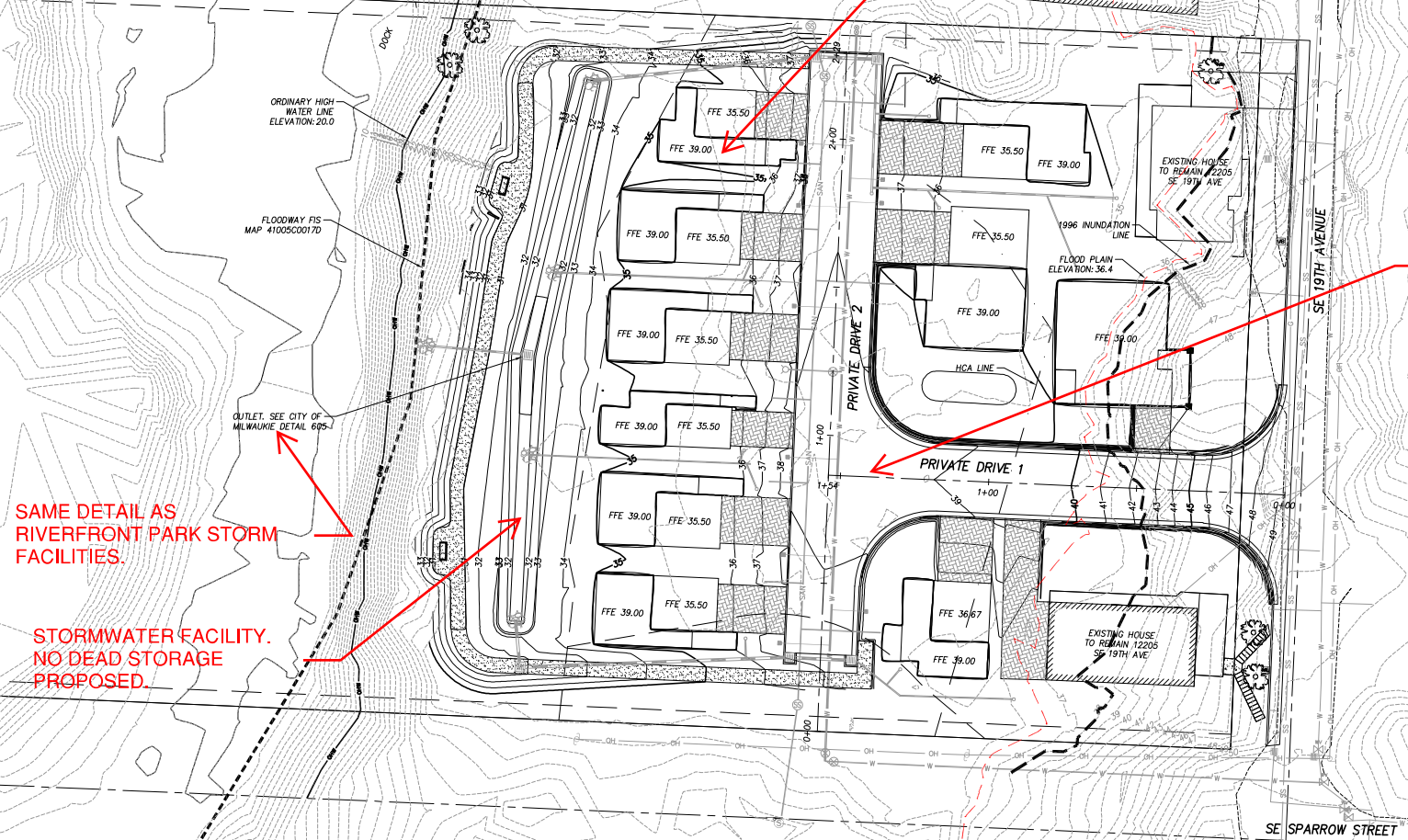
Statistics	Value
General	
Base Surface	EG
Comparison Surface	PG
Cut Factor	1.000
Fill Factor	1.000
Cut volume (adjusted)	1659.93 Cu. Yd.
Fill volume (adjusted)	1658.91 Cu. Yd.
Net volume (adjusted)	1.02 Cu. Yd. <Cut>
Cut volume (unadjusted)	1659.93 Cu. Yd.
Fill volume (unadjusted)	1658.91 Cu. Yd.
Net volume (unadjusted)	1.02 Cu. Yd. <Cut>

BALANCED CUT/FILL FOR ENTIRE AREA BELOW THE 1996 FLOOD EVENT

BUILDINGS DESIGNED FOR 1996 FLOOD

PROPOSED LEGEND:

- SANITARY LINE
- WATER LINE
- STORM LINE
- ATRIUM INLET
- PEDESTRIAN PATH
- MAJOR CONTOUR - 5' INTERVALS
- MINOR CONTOUR - 1' INTERVALS
- RIP RAP



ORDINARY HIGH WATER LINE ELEVATION: 20.0

FLOODWAY FIS MAP 41005C0017D

OUTLET. SEE CITY OF MILWAUKIE DETAIL 695

SAME DETAIL AS RIVERFRONT PARK STORM FACILITIES.

STORMWATER FACILITY. NO DEAD STORAGE PROPOSED.

ACCESS DESIGNED FOR 100-YEAR FLOOD

GRADING PLAN
ELK ISLAND ESTATES
MILWAUKIE, OREGON

Harper Houff Peterson
Righellis Inc.
LANDSCAPE ARCHITECTS + SURVEYORS
205 SE Spokane Street, Suite 200, Portland, OR 97202
Phone: 503.221.1121 www.hhp.com Lic: 26523.1111

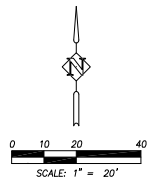


DESIGNED:	KKV
DRAWN:	HPFR TEAM
CHECKED:	KKV
DATE:	JUNE 2019

NO.	REVISION	DATE	DESCRIPTION
1	REVISED GRADING		
2	GRADING MODIFICATION		
3	REVISED ANALYSIS TO 1996 FLOOD LINE		

SHEET NO. **4**

JOB NO. MSC-221



Vegetated Swales Examples



Vegetated Swales Examples



Vegetated Swales Examples



Vegetated Swales Examples



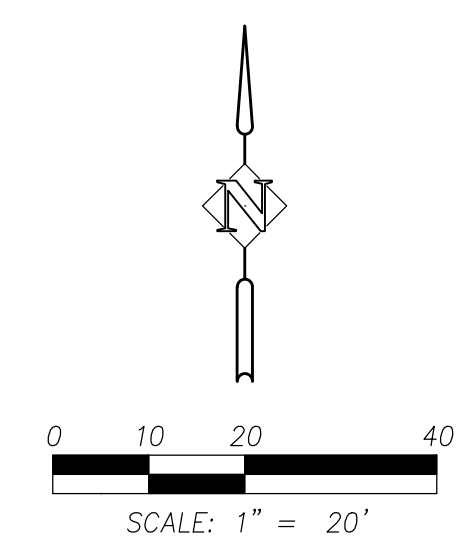
Surface Properties - earthwork **EARTHWORK DATA:**

Information | Definition | Analysis | Statistics | EARTHWORK CALCULATED FOR CUT/FILL BELOW THE 38 FOOT CONTOUR

Statistics	Value
General	
TIN	
Volume	
Base Surface	EG
Comparison Surface	FG
Cut Factor	1.000
Fill Factor	1.000
Cut volume (adjusted)	1659.93 Cu. Yd.
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Net volume (adjusted)	1.02 Cu. Yd. <Cut>
Cut volume (unadjusted)	1659.93 Cu. Yd.
Fill volume (unadjusted)	1658.91 Cu. Yd.
Net volume (unadjusted)	1.02 Cu. Yd. <Cut>

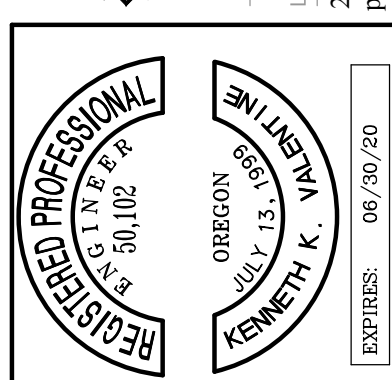
PROPOSED LEGEND:

	SANITARY LINE
	WATER LINE
	STORM LINE
	ATRIUM INLET
	PEDESTRIAN PATH
	MAJOR CONTOUR - 5' INTERVALS
	MINOR CONTOUR - 1' INTERVALS
	RIP RAP



GRADING PLAN
ELK ISLAND ESTATES
 MILWAUKIE, OREGON

Harper Houf Peterson
Righellis Inc.
 ENGINEERS*PLANNERS
 LANDSCAPE ARCHITECTS*SURVEYORS
 205 SE Spokane Street, Suite 200, Portland, OR 97202
 phone: 503.221.1131 www.hhpr.com fax: 503.221.1171



DESIGNED:	KKV
DRAWN:	HHPR TEAM
CHECKED:	KKV
DATE:	JUNE 2019

1	REVISD GRADING		
2	GRADING MODIFICATION		
3	REVISD ANALYSIS TO 1996 FLOOD LINE		

APRIL 2019									
8/5/2019									
8/12/2019									

DATE	NO.	DESCRIPTION

R E V I S I O N S

SHEET NO. **4**

JOB NO. MSC-221

INSULATED SERIES

This series of vents is ideal for areas requiring flood venting protection but no natural air ventilation.

The flood door contains a 2" insulated core that has an R-value of 8.34 and the vent frame is lined with felt weather stripping, helping to keep the enclosure as insulated from the elements as possible.

IDEAL FOR:

- Garages
- Full height enclosures (e.g. walkouts)
- Conditioned crawlspaces
- Storage facilities
- Metal buildings
- Foyers

1 Flood Vent 1540-520

2 Stacker 1540-521

Stacker Models are twice as efficient as a single unit and are a great solution for large amounts of square footage, and in situations where there is not enough wall space to fit in single units.

3 Wood Wall 1540-570

Wood Wall Models are designed to fit between studs spaced at 16" on center. Pre-drilled slots in the four corners on the vent flange make for an easy installation.



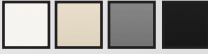
Pictured in powder coat paint gray

For more information on Flood Protection Solutions, contact:

Smart Vent 430 Andbro Drive, Unit 1 • Pitman, NJ 08071
Website: www.smartvent.com Tel: (877) 441-8368 Email: info@smartvent.com



STANDARD FINISH POWDER COAT WHITE
POWDER COAT PAINT OPTIONS:



Custom colors also available.



MODEL NUMBER	FLOOD COVERAGE	VENT SIZE	ROUGH OPENING
1540-520	200 sq. ft.	16"W x 8"H x 3"D	16 ¹ / ₄ in x 8 ¹ / ₄ in
1540-521	400 sq. ft.	16"W x 16"H x 3"D	16 ¹ / ₄ in x 16 ³ / ₈ in
1540-570	200 sq. ft.	14 ¹ / ₂ "W x 8 ¹ / ₂ "H x 3"D	14 ¹ / ₂ in x 8 ³ / ₄ in



To view other sizing options see Multi-frames

For more information on Flood Protection Solutions, contact:

Smart Vent 430 Andbro Drive, Unit 1 • Pitman, NJ 08071
Website: www.smartvent.com Tel: (877) 441-8368 Email: info@smartvent.com

DUAL FUNCTION SERIES

This series of vents offers certified flood venting protection with superior automatic natural ventilation control. Ideal for crawlspace applications and other areas requiring flood venting protection as well as natural air ventilation.

VENTILATION

A bimetal coil automatically opens and closes the ventilation louvers as temperature changes from 35° F to 75° F.

No electricity is required.

In the event of a flood, the internal floats lift to release the flood door to rotate open and relieve the hydrostatic pressure regardless of the louvers' position, open or closed.

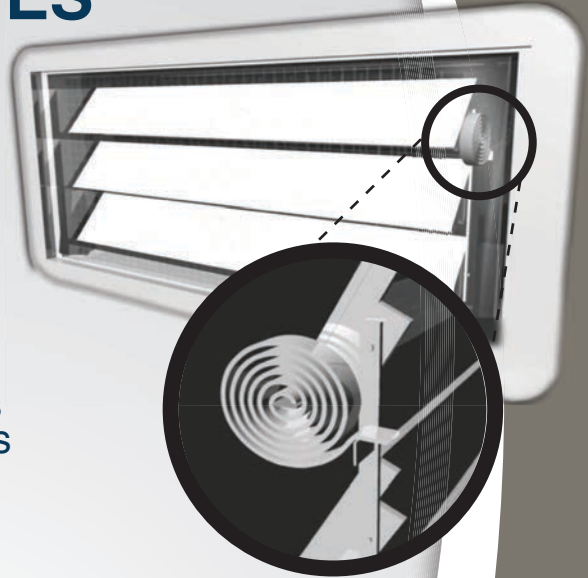
1 Smart Vent
1540-510

2 Stacker
1540-511

Stacker Models are twice as efficient as a single unit and are a great solution for large amounts of square footage, and in situations where there is not enough wall space to fit in the necessary or required single units.

2

Pictured in powder coat white



Pictured in custom powder coat black



For more information on Flood Protection Solutions, contact:

Smart Vent 430 Andbro Drive, Unit 1 • Pitman, NJ 08071
Website: www.smartvent.com Tel: (877) 441-8368 Email: info@smartvent.com



STANDARD FINISH POWDER COAT WHITE
POWDER COAT PAINT OPTIONS:



Custom colors also available.



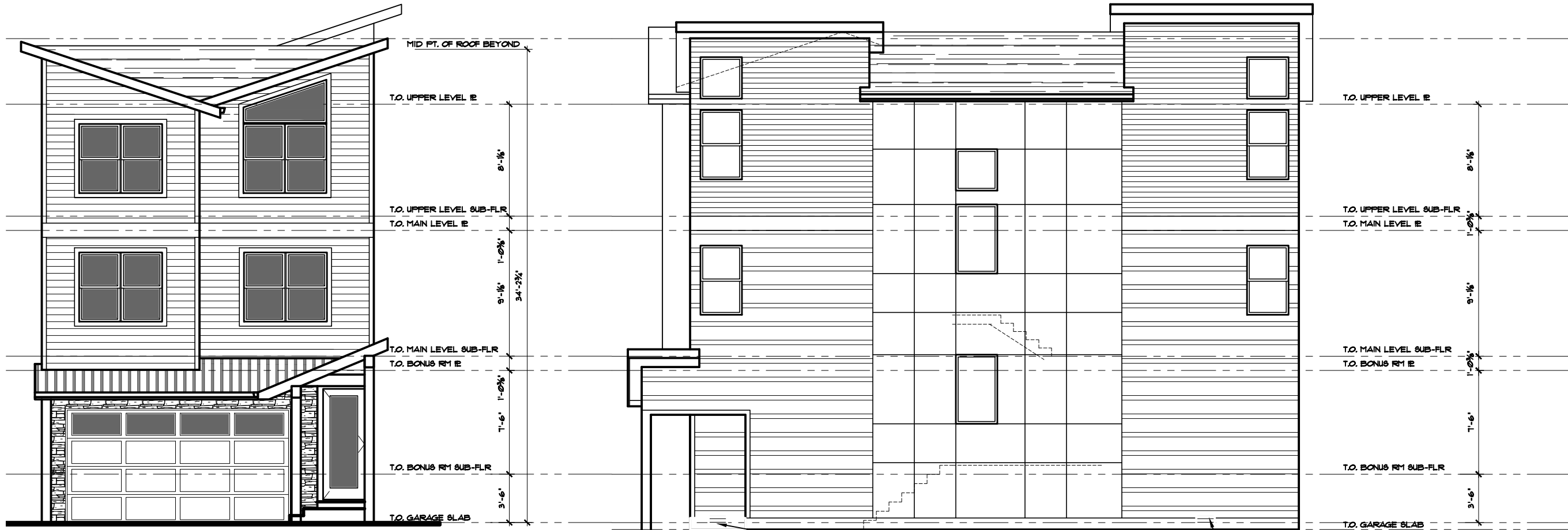
MODEL NUMBER	FLOOD COVERAGE	AIR VENTILATION	VENT SIZE	ROUGH OPENING
1540-510	200 sq. ft.	51 sq. in.	16" W x 8"H x 3"D	16 ¹ / ₄ in x 8 ¹ / ₄ in
1540-511	400 sq. ft.	102 sq. in.	16" W x 16"H x 3"D	16 ¹ / ₄ in x 16 ³ / ₈ in



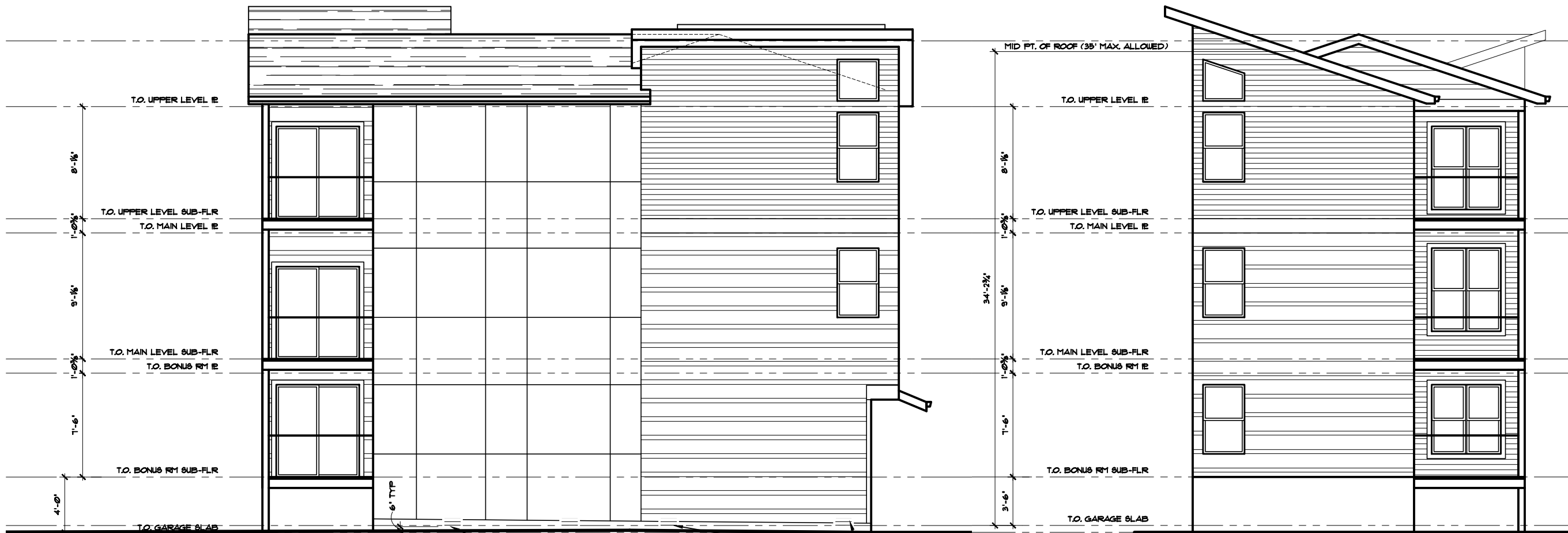
To view other sizing options see Multi-frames

For more information on Flood Protection Solutions, contact:

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Website: www.smartvent.com Tel: (877) 441-8368 Email: info@smartvent.com



'SMART VENT' AUTOMATIC FLOOD VENTS- (3) REQUIRED AT GARAGE AND (3) REQUIRED AT CRAWL SPACE



'SMART VENT' AUTOMATIC FLOOD VENTS- (3) REQUIRED AT GARAGE AND (3) REQUIRED AT CRAWL SPACE